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9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 IN THE MATTER OF THE  
EXTRADITION OF

13 KENNETH WAYNE FROUDE,

14 A Fugitive from the Government  
15 of Canada.

No. CV 15-08623-JLS-E

STIPULATION REGARDING ADDITIONAL  
TIME FOR FILING OF GOVERNMENT'S  
REPLY BRIEF; [PROPOSED] ORDER

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18 On behalf of the government of Canada, complainant United States  
19 of America, by and through its counsel of record, the United States  
20 Attorney for the Central District of California and Assistant United  
21 States Attorney Nathaniel B. Walker, and KENNETH WAYNE FROUDE  
22 ("FROUDE"), by and through his attorney, Deputy Federal Public  
23 Defender Marisol Orihuela, hereby submit the following stipulation:

24 1. On or about January 12, 2016, this Court ordered that the  
25 United States file its opening brief in the above-captioned matter by  
26 March 14, 2016; that FROUDE file his opposition brief by March 21,  
27 2016; and that the United States file its reply brief by March 28,  
28 2016. The Court also scheduled a hearing for April 11, 2016.

1           2.    The United States did file its opening brief on or about  
2 March 14, 2016, and FROUDE filed his opposition brief on or about  
3 March 21, 2016.

4           3.    Based on arguments the parties have raised, the United  
5 States has requested additional information from the Canadian  
6 government addressing whether a Long-Term Supervision Order is part  
7 of a criminal sentence under Canadian law. The United States  
8 represents that the Canadian government has agreed to provide the  
9 requested information, but will require additional time to obtain and  
10 prepare it.

11          4.    Accordingly, the United States requests that it be  
12 permitted until Monday, April 4, 2016, to file its reply brief.

13          5.    The parties do not request a continuance of the April 11,  
14 2016, hearing date.

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1           6.     FROUDE does not object to the government's request for  
2 additional time to file its reply brief, so long as the scheduled  
3 hearing date remains on April 11, 2016.

4 Dated: March 28, 2016

Respectfully submitted,

5                   EILEEN M. DECKER  
6                   United States Attorney

7                   LAWRENCE S. MIDDLETON  
8                   Assistant United States Attorney  
9                   Chief, Criminal Division

10                   /s/

11                   NATHANIEL B. WALKER  
12                   Assistant United States Attorney

13                   Attorneys for Plaintiff  
14                   UNITED STATES OF AMERICA

15 Dated: March 28, 2016

Respectfully submitted,

16                   HILARY POTASHNER  
17                   Federal Public Defender

18                   /s/ (e-mail authorization 3/28/16)

19                   MARISOL ORIHUELA  
20                   Deputy Federal Public Defender

21                   Attorneys for KENNETH WAYNE FROUDE  
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